

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
NORTHERN DIVISION**

DEBBY L. OTTE,

Plaintiff,

v.

**BAXTER HEALTHCARE CORPORATION,
ET AL.,**

Defendants.

**Civil Action No.
00 CV 910**

MOTION FOR ADMISSION PRO HAC VICE

Pursuant to Local Rule 101.1(b) of this Court, Bruce R. Parker, a partner in the law firm of Venable, Baetjer and Howard, LLP, and counsel for Allegiance Healthcare Corporation and Baxter Healthcare Corporation, the defendants in the above referenced proceeding, respectfully requests that this Court enter an order permitting Stacey Feeley Cavanagh of the law firm of Ungaretti & Harris to appear pro hac vice before this Court. In support of this Motion, undersigned counsel respectfully state as follows:

1. Venable, Baetjer and Howard, LLP is counsel for Allegiance Healthcare Corporation and Baxter Healthcare Corporation in this proceeding.
2. Ms. Cavanagh is an attorney at law admitted to practice in the Supreme Court of Illinois, the United States District Court for the Northern District of Illinois, and the United States Court of Appeals for the Seventh Circuit. Ms. Cavanagh is in good standing in all courts in which she has been admitted. Ms. Cavanagh is an attorney with the law firm of Ungaretti & Harris, 3500 Three First National Plaza, Chicago, Illinois, 60602.

3. Ms. Cavanagh has not been admitted pro hac vice in this Court during the 12 months immediately preceding the filing of this Motion. Ms. Cavanagh has never been disbarred, suspended, or denied admission to practice in any court.

4. Ms. Cavanagh is familiar with the Federal Rules of Civil Procedure, the Local Rules of the United States District Court for the District of Maryland, the Federal Rules of Evidence, and the Rules of Professional Conduct, and understands that she shall be subject to the disciplinary jurisdiction of this Court.

5. Co-counsel for Ms. Cavanagh in this proceeding will be the undersigned who has been formally admitted to the bar of this Court.

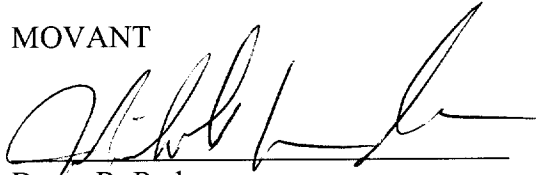
6. It is understood that admission pro hac vice does not constitute formal admission to the bar of this Court.

WHEREFORE, Allegiance Healthcare Corporation, Baxter Healthcare Corporation and Mr. Parker respectfully request that this Court enter an Order admitting Stacey Feeley Cavanagh pro hac vice to appear before this Court in the above-captioned case on behalf of Allegiance Healthcare Corporation and Baxter Healthcare Corporation.

Dated: Baltimore, Maryland
April 15, 2003

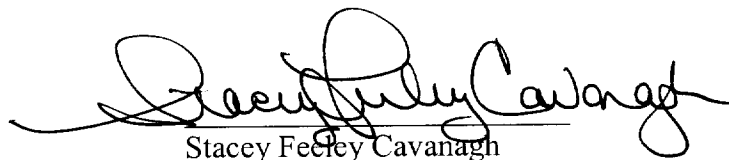
Respectfully submitted,

MOVANT

A handwritten signature in black ink, appearing to read "Bruce R. Parker", written over a horizontal line.

Bruce R. Parker
Federal Bar No. 00028
Michele R. Kendus
Federal Bar No. 26586
Venable, Baetjer and Howard, LLP
1800 Mercantile Bank & Trust Building
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410-244-7400
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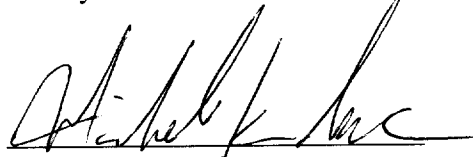
PROPOSED ADMITTEE

A handwritten signature in black ink, appearing to read "Stacey Feeley Cavanagh", written over a horizontal line.

Stacey Feeley Cavanagh
Ungaretti & Harris
3500 Three First National Plaza
Chicago, Illinois 60602
312-977-4400
312-977-4405 (fax)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this ^{5th}15 day of April, 2003, a copy of the foregoing Motion for Admission Pro Hac Vice and proposed Order for Admission Pro Hac Vice, were sent via electronic filing as per notification to be received from the United States District Court for the District of Maryland Northern Division.


Michele R. Kendus

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ORDER FOR ADMISSION PRO HAC VICE

Bruce R. Parker, a partner in the law firm of Venable, Baetjer and Howard, LLP, and counsel for Allegiance Healthcare Corporation and Baxter Healthcare Corporation, the defendants in the above referenced proceeding, having filed a Motion requesting that this Court enter an Order permitting Stacey Feeley Cavanagh of the law firm of Ungaretti & Harris to appear pro hac vice before this Court. The Motion having been considered by this Court,

IT IS HEREBY ORDERED THAT THE MOTION IS GRANTED.

This ____ day of _____, 2003.

J. Catherine C. Blake
United States District Judge